



**JIM GERINGER**  
GOVERNOR



## Department of Environmental Quality

Herschler Building • 122 West 25th Street • Cheyenne, Wyoming 82002

ADMINISTRATION (307) 777-7758 FAX 777-7682	ABANDONED MINES (307) 777-6145 FAX 634-0799	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7368 FAX 777-6937	LAND QUALITY (307) 777-7756 FAX 634-0799	SOLID & HAZARDOUS WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
--	---	---	---	--	---	---

February 5, 1997

Ms. Dolly A. Potter  
Environmental Engineer  
Solvay Minerals  
P.O. Box 1167  
Green River, WY 82935

RE: Air Toxics Modeling

Dear Ms. Potter:

I apologize for the delay in responding to the modeling protocol submitted under cover letter dated June 20, 1996 from URS Consultants. The Division has reviewed the protocol and offers the following comments:

- 1) Comparison of Modeled Concentrations to Existing State Standards (non-carcinogens): It has been the Division's policy to require each company to review the National Air Toxics Information Clearinghouse (NATICH) data base and develop a range of acceptable ambient concentrations from all states for comparison to the modeled concentration at the Solvay facility. Certainly if the modeled HAP concentration at the Solvay facility is less than the most stringent state limit, the modeled concentration would be considered acceptable.
- 2) Comparison for Carcinogens: Division policy has been to model annual concentrations for carcinogens and utilize EPA unit risk factors and determine individual risk. As a basis of comparison, the Division has looked at risks of less than one in a million to be acceptable based on maximum modeled concentration.
- 3) Sources Modeled: HAPs from the dryers should be considered in the modeling analysis along with the calciners and mine vents.
- 4) All modeling should follow EPA Guidelines for air quality modeling. Use of the ISCST3 model is acceptable. Downwash and all other guideline requirements should be followed.

With the inclusion of the above items, the HAPs modeling protocol will be acceptable to the Division.

**SOLVAY2016\_1.4\_000350**

Ms. Dolly A. Potter  
February 5, 1997  
Page 2

Should you have any questions concerning these issues, please feel free to contact Lee Gribovicz or Ken Rairigh.

Sincerely,

A handwritten signature in black ink, appearing to read "Bernard J. Dailey". The signature is fluid and cursive, with a large, stylized "B" and "D".

Bernard J. Dailey  
Engineering Supervisor  
Air Quality Division

cc: Lee Gribovicz  
Ken Rairigh